

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

JOSEPH ROSALINA, ESQ SPECIAL ADMINISTRATOR OF THE ESTATE OF MARK L. TURNER, DECEASED,	) CASE NO. 1:23-cv-02147
Plaintiff,	)
vs.	) JUDGE BRIDGET MEEHAN
THE METROHEALTH SYSTEM, et al.,	) BRENNAN
Defendants.	)
	)
	) <b><u>PLAINTIFF'S PRELIMINARY ESTIMATE AND/OR BUDGET OF COSTS AND FEES</u></b>
	)

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The following is a preliminary estimate and/or budget of Plaintiff's costs and attorney fees anticipated to be the subject of a claim in this case. These

<u>Attorneys' Fees</u>	<u>Costs</u>		
Preliminary Investigation & Filing Complaint	<u>\$10,000.00</u>	Depositions	<u>\$30,000.00</u>
Procedural Motions Practice	<u>\$5,000.00</u>	Experts	<u>\$30,000.00</u>
Discovery	<u>\$100,000.00</u>	Witness Fees	<u>\$2,500</u>
Dispositive Motions Practice	<u>\$50,000.00</u>	Other	<u>\$10,000.00</u>
Settlement Negotiations	<u>\$5,000.00</u>		
Trial	<u>\$100,000.00</u>		
<b><u>TOTAL FEES</u></b>	<b><u>\$360,000.00</u></b>	<b><u>TOTAL COSTS</u></b>	<b><u>\$72,500.00</u></b>

*/s/ Kevin C. Hulick*  
NICHOLAS A. DICELLO (0075745)  
KEVIN C. HULICK (0093921)

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28<sup>th</sup> day of March 2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record and may be obtained through the Court's CM/ECF Systems.

*/s/ Kevin C. Hulick*

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